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February 24, 2022

Via ECF and E-Mail

Hon. Martin Glenn
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004

Re: 78-80 St. Marks Place, LLC
Case No. 21-12139 (MG)

Dear Judge Glenn:

This firm is counsel to St. Mark's Mixed Use LLC ("Lender"), the Debtor's secured lender in the above referenced case.

We write concerning the Debtor's motion for debtor-in-possession financing (the "Financing Motion") and the Debtor's motion for the use of cash collateral (the "Cash Collateral Motion"; and together with the Financing Motion, collectively the "Motions") currently returnable on March 2, 2022. Specifically, it has come to our attention that the clarity of certain exhibits to Lender's Omnibus Objection to the Motions and the declarations filed therewith was impacted in our effort to convert PDF documents to PDF/A and to reduce the file size of such exhibits so that PACER would not "bounce" such documents during e-filing for being in the wrong format or for being too large in size. The exhibits at issue are four appraisals. Attached as Exhibit 1 to the Declaration of Joel Leitner (ECF No. 25-1) is an appraisal performed by Leitner Bergman containing 177 pages; attached as Exhibit 1 to the Declaration of Wendy Hwang (ECF No. 27-1) is an appraisal performed by Newmark Knight Frank containing 181 pages; and attached as Exhibits 8 and 9 to the Omnibus Objection (ECF No. 24-8 and 24-9)

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are two appraisals by Ronald M. Gold (containing 340 and 355 pages, respectively). Additionally, upon converting the Leitner Berman appraisal from PDF to a searchable PDF/A format, the electronic signature of Adam Wolk, an associate appraiser, was apparently removed and in its place was a grey box. We represent to the Court that the same Leitner Berman appraisal was, in fact, signed by Adam Wolk when it was filed.

After conferring with PACER and the Bankruptcy Court's IT department, we are re-filing the documents in PDF format, copies of which are attached hereto.

Respectfully yours,

/s/ Robert A. Abrams

Enclosures

cc: Andrew Gottesman, Esq. (via ECF and email)
Arthur Schwartz, Esq. (via ECF and email)